## **REMARKS**

Claims 1-11 remain pending in the application. Claim 1 is amended to clarify distinctions between the claimed invention and the teachings of the cited references.

Independent claim 1, from which the remaining claim 1-11 depend, recites a method for conditioning a surface of a polishing pad after chemical-mechanical polishing, which comprises exposing the pad surface to cleaning material that is entirely in the vapor phase and which comprises steam. The claim is amended to clarify that the polishing pad is not itself a semiconductor substrate.

Claims 1-11 stand rejected as being unpatentable over Applicant's admitted priorart, Han, Lorimer and Brunelli, in various combinations.

The cited reference of Han is utilized in all of the cited combinations for allegedly showing conditioning of a polishing pad with a cleaning material entirely in the vapor phase, and comprising steam. Applicant respectfully submits, however, that Han is not disclosing an apparatus utilized for conditioning a surface of a polishing pad, but rather describes an apparatus utilized for cleaning a surface of a semiconductor substrate (specifically, to etch oxide, clean contaminants and remove etch residue from a semiconductor substrate). The sections of Han that the Examiner cites to allegedly show conditioning of a polishing pad, all are directed toward teachings of cleaning surfaces of semiconductor substrates. Applicant has further clarified the distinction between the invention of claim 1 and the teachings of Han by adding the recitation that the polishing pad of claim 1 is not itself a semiconductor substrate.

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themselves semiconductor substrates.

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As Han teaches methods of cleaning semiconductor substrates, and as the polishing pad of claim 1 is now expressly recited to not be a semiconductor substrate, the cleaning of surfaces of semiconductor substrates taught by Han is <u>not</u> the same as the conditioning of a polishing pad as recited in claim 1. Persons of ordinary skill in the art would not be motivated to incorporate Han's teachings of methodologies for cleaning semiconductor substrates into methodologies for conditioning polishing pads which are not

As all of the Examiner's rejections of all of claims 1-11 are based upon incorporation of Han's methodology into processes for conditioning polishing pad surfaces, and as such incorporation is inappropriate in light of the amendments to claim 1 provided herein, it is believed that claims 1-11 are now allowable over the cited references. Applicant therefore requests formal allowance of claims 1-11 in the Examiner's next action.

Respectfully submitted,

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